

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	
)	CRIMINAL NO. 13cr10305
)	
UNITED STATES OF AMERICA)	Counts 1 and 2:
)	18 U.S.C. § 2422(b)
v.)	Coercion and Enticement
)	of a Minor
KEITH GAGE,)	
Defendant.)	18 U.S.C. § § 2428
)	Criminal Forfeiture

INDICTMENT

COUNT ONE: 18 U.S.C. § 2422(b) – Coercion and Enticement of a Minor;

The Grand Jury charges that:

Between on or about May, 2013, and on or about August 24, 2013, within the District of Massachusetts, and elsewhere,

KEITH GAGE,

defendant herein, did use a facility and means of interstate and foreign commerce, to wit, the Internet and an interstate telephone carrier, to knowingly persuade, induce, entice and coerce, and to knowingly attempt to persuade, induce, entice and coerce, an individual, who has not attained the age of 18 years, “Minor A”, to engage in sexual activity for which any person could be charged with a criminal offense, to wit, a violation of Massachusetts General Laws chapters 265 and 272.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO: 18 U.S.C. § 2422(b) – Coercion and Enticement of a Minor;

The Grand Jury further charges that:

Between on or about August 24, 2013, and on or about September, 2013, within the District of Massachusetts, and elsewhere,

KEITH GAGE,

defendant herein, did use a facility and means of interstate and foreign commerce, to wit, an interstate telephone carrier, to knowingly attempt to persuade, induce, entice and coerce, an individual who has not attained the age of 18 years, “Minor A”, to engage in sexual activity for which any person could be charged with a criminal offense, to wit, a violation of Massachusetts General Laws chapters 265 and 272.

All in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATION
(18 U.S.C. § 2428)

The Grand Jury further charges that:

1. The allegations of Counts One and Two of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

2. Upon conviction of an offense in violation of 18 U.S.C. § 2422(b), as set forth in Counts One and Two of this Indictment,

KEITH GAGE,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, all of his right, title, and interest in any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, items seized by law enforcement on or about September 16, 2013, from the defendant's residence in Middleboro, Massachusetts.

3. If any of the property described in Paragraph 2 above, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

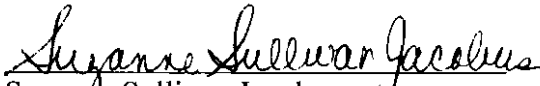
it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 2.

All pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL




Foreperson of the Grand Jury



Suzanne Sullivan Jacobus
Assistant United States Attorney

District of Massachusetts; October 22, 2013

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk 10/22/13 @ 2:25pm